

### **REMARKS**

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the notice that claims 42-48 would be allowable if amended to overcome the rejections under 35 U.S.C. §112, second paragraph set forth in the office action. Applicants also wish to thank the Examiner for the comment that the other independent claims would also be allowable if written to include limitations from independent claim 42. However, as set forth below, Applicants respectfully submit that the unallowed claims are distinguishable over the references and that the references do not teach the claimed subject matter.

Claims 24, 29-33, 38-53 and 57-60 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite. Claim 24 has been amended to indicate that the display preferences are determined as to whether they can be fulfilled in observance of configuration properties of multiple displays and configuration properties of a computing system. In addition, the display preferences correspond to each of the multiple displays. Amendments to the other independent claims are also believed to address the Examiner's questions. As to claim 23, the office action asked to identify what types of resolution of a plurality of displays are supported to be reconfigured in the claim. However, Applicants respectfully submit that the types of resolution can be any suitable type and is not intended to be a limitation. As stated for example, on page 5 of Applicants' Specification, configuration properties of a display include, for example, display refresh rate, resolution, type of display (e.g., television, CRT, LCD), etc. The claims are believed to be definite to one of ordinary skill in the art as written.

Regarding the phrase containing "can" and "cannot", Applicants respectfully request reconsideration since in the context of the claim, these words are not indefinite and refer to operations that are specifically disclosed in the Specification and are fully ascertainable. See for

example, Specification pages 5-7 and elsewhere. Applicants respectfully submit that the claimed operations are disclosed. The office action has not identified why they are not believed to be disclosed in view of the Specification. If the rejection is maintained, Applicants respectfully request a showing as to why the claimed subject matter is not actually disclosed as alleged.

Claim 58 stands rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 5,285,192 (Johary et al.). Applicants have amended claim 58 to note that the method of configuring multiple displays includes determining in connection with an image or portion thereof to be displayed on the multiple displays at the same time, whether received display preferences can be fulfilled in observance of both configuration properties of the multiple displays and configuration properties of the computing system. In addition, the claim includes determining whether a current configuration of the multiple displays to the computing system can be reconfigured such that the display preferences of the multiple displays can be fulfilled at the same time while maintaining effective current configuration when the display preferences cannot be fulfilled. The method also includes displaying the image or a portion thereof on the multiple displays at the same time. Johary is directed to a single display system and does not contemplate controlling multiple displays for displaying an image or portion thereof at the same time and determining display preferences associated with the multiple displays that display images at the same time nor any multiple display reconfiguration based on display preferences of multiple displays. Accordingly, Applicants respectfully submit that claim 58 is in condition for allowance.

Claim 59 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Johary et al. in view of Bril et al. Applicants respectfully reassert the relevant remarks made above with respect to Johary and as such, this claim is also in condition for allowance.

Claims 57 and 60 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,841,418 (Bril et al.) in view of Johary et al. The Bril reference is directed to a system that employs dual displays having independent resolutions and refresh rates that utilizes separate, fixed and dual data paths wherein each fixed data path operates at its own clock frequency characteristic of a refresh rate and pixel resolution. The office action alleges that the graphics controller 210 employs a processing unit as claimed and refers to the claimed processing unit as a “CPU interface”. However, Bril does not teach that a CPU interface in FIG. 2 is part of the graphics controller 210 and in fact, shows that it is external thereto and as such, does not comprise the CPU interface. The claim is in condition for allowance for this reason alone.

It is also alleged that the Bril reference teaches the claimed memory that stores programming instructions that when executed by the processing unit causes a coupling controller of the processing unit to perform the claimed operations. However, Applicants respectfully note that the “CPU interface” is not a processing unit of the graphics controller 210 as noted above. Also, the display memory 220 alleged to correspond to Applicants’ claimed memory does not contain executable instructions that are executed by the “CPU interface” as alleged. The display memory 220 is described as merely containing data, a portion of which may be set aside as a half frame buffer for use in generating flat panel display images. Applicants are unable to find any reference to the display memory 220 that states that this display memory contains executable instructions that are executable by the external CPU interface as alleged in the office action. Accordingly, Applicants respectfully submit that the claims are in condition for allowance since the reference does not teach what is alleged.

As to claim 60, Applicants respectfully note that there is no simultaneous display by multiple displays of an image or portions of an image or different images set forth in Johary. As such, Applicants respectfully submit that the claim is in condition for allowance.

As to claim 24, this claim also appears to be rejected under 35 U.S.C. §103(a) in view of Bril and Johary. The office action takes official notice that “display drivers are computer program instructions which allow a video card to communicate with an operating system” and that it would have been obvious to have included a plurality of display drivers in the single graphics processing circuit 230 of Bril. However, Applicants respectfully submit that this reasoning is incorrect since as admitted by the office action, display drivers are actually executed on a CPU. The CPU in Bril is not part of the graphics processing circuit 230, and there is no reason why the graphics controller 210 would act as a CPU. Likewise, Applicants respectfully submit that it appears that claim 24 is being misapprehended since it is directed to a video graphics processing circuit, not a central processing unit. FIG. 1 of Applicants’ Specification also shows a separate CPU 14 as being different from the coupling controller 26 that is within the video graphics processing circuit 12. The operations described in claim 24 are carried out by the video graphics processing circuit as claimed not a display driver that is actually executed on a completely different device, namely a CPU. Applicants respectfully submit that the basis for the rejection is incorrect in view of the Specification, the claim, and common knowledge with respect to display drivers. As such, Applicants respectfully submit that claims 24, 33, and 38 are allowable at least for these reasons. Claims 39 and 41 are also allowable for similar reasons as noted above.

As to claim 49, the office action alleges that Johary teaches a coupling module coupled to a plurality of display controllers, the plurality of display drivers and screen memory, the coupling

module comprising means for switching the plurality of display drivers and the plurality of display controllers to appropriate screen memory portions (see page 14 of office action) and refers to expanded register 22 of FIG. 2. However, Johary does not teach the claimed coupling module since there are not multiple display controllers taught in Johary nor multiple display drivers since Johary is directed to a single display system that compensates CRT video information to generate a display compatible with a flat panel device. No portion of Johary is cited as teaching the coupling module, the display controllers or the display drivers as claimed. The expanded registers 22 in Johary are simply used to compensate video information to generate new video addresses to reconfigure video information in a manner compatible with a particular display device such as a flat panel display (see column 4, lines 26-34). Since Johary does not teach what is alleged, Applicants respectfully submit that the claim is in condition for allowance.

Claims 52 and 53 are allowable at least as depending from an allowable base claim.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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